



**Special Education Advisory Committee SEAC  
Policies, Practices and Procedures Subcommittee**

**(Proposed) Policy 5340  
Policy 5-55**

**December 6, 2019  
Disciplinary Procedures for Students with  
Disabilities Review, Findings, and  
Recommendations Report**

**May 5, 2021 Update**

Prepared For:  
SEAC Membership  
Loudoun County School Board

## Summary of SEAC's Recommendations

Recommendation 1: Rewrite the title and policy to remove the word discipline and use the language and concepts of PBIS. **Not addressed.**

Title suggestion: Behavioral Interventions and Supports for Students With Disabilities

Recommendation 2: Rewrite the policy to emphasize constructive interventions over tactics or disciplinary sanctions that remove students from instruction. **Not addressed.**

Recommendation 3: Suspension, and exclusionary disciplinary practices tantamount to suspension, shall not be permitted except where required by law. **Not addressed.**

Recommendation 4: Rewrite the policy to cite the Virginia Regulations Governing Special Education Programs, 8VAC20-81-160 (Discipline Procedures) instead of incorrectly restating those procedures. **Not addressed.**

Recommendation 5: Change "School personnel may consider any unique circumstances" back to the existing policy wording, "School personnel shall consider any unique circumstance," and change "school personnel should review the student's [IEP/504/BIP]" to "school personnel shall review the student's [IEP/504/BIP]." **Not addressed.**

**As of the writing of this document, we are not aware of any effort to revise the policy to address SEAC's community concerns and policy recommendations.**

# 1. Introduction

## a. Policy, Practices, and Procedures Subcommittee

The Regulations Governing Special Education Programs for Children with Disabilities in Virginia reflect the state and federal requirements for the provision of special education and related services. The regulations outline the functions of the SEAC, as specified by Section 8VAC20-81-230 (D)(2), and are as follows:

1. Advise the local school division of needs in the education of students with disabilities;
2. Participate in the development of priorities and strategies for meeting the identified needs of students with disabilities;
3. Submit periodic reports and recommendations regarding the education of students with disabilities to the division superintendent for transmission to the local school board;
4. Assist the local school division in interpreting plans to the community for meeting the special needs of students with disabilities for educational services;
5. Review the policies and procedures for the provision of special education and related services prior to submission to the local school board; and
6. Participate in the review of the local school division's annual plan.

This report satisfies requirements 1, 2, and 5 above as set forth by the Individuals with Disabilities Education Act (IDEA) and the Regulations Governing Special Education Programs for Children with Disabilities in Virginia.

SEAC created a Policies, Practices and Procedures subcommittee to review and provide advice to the School Board on whether and how policies, practices and procedures meet the needs in the education of children with disabilities. The subcommittee was established by a vote of the SEAC membership in October of 2018 as part of the recommendations included in SEAC's 2017-2018 Annual Report. The subcommittee's tasks include:

**Recommendation 1A:** Establish and use a workflow to introduce and provide SEAC with special education policies, practices, and procedures that are new, require periodic review, or revised to enable SEAC to complete a thorough review in a reasonable timeframe (given that SEAC meets monthly) and provide input prior to submission to the school board.

This report includes findings and recommendations to the Loudoun County School Board. The recommendations were developed as a result of a collaborative process

that included input from the SEAC membership and the recommendations were adopted by a vote by a quorum of the full committee.

### **b. Issue Background and History**

The School Board is required to periodically review all policies, and as part of that process, proposed policy 5340, Disciplinary Procedures for Disabled Students [LCPS5340], a revision of existing policy 5-55 [LCPS5-55], was identified for review by SEAC.

The subcommittee met on June 12, June 26, September 11, and September 25, and developed a set of proposed recommendations that were presented to the full committee at the October 2 SEAC meeting. Due to meeting running late and concerns expressed by SEAC members that they would like to research the issue themselves before voting, a motion was approved to defer the vote on these recommendations until the next meeting. In the interim, the policy subcommittee made available additional materials (such as peer-reviewed research) on the subject matter and this was announced to the members and community. At the November 6, 2019 SEAC meeting, having had the opportunity to further study the issue and consider the recommendations, all of the proposed recommendations on this policy were unanimously approved by the SEAC.

Student behavior in general, and behavior of students with disabilities in particular, are serious and perennial areas of significant concerns and need for improvement. In 2013, the School Board chartered a Discipline Task Force [LCPS14] to study issues such as these and the discriminatory rates of discipline disproportionality for minority and Special Education students. This resulted in the Task Force adopting recommendations such as [LCPS13]:

D.3 “Endo[r]se the planned implementation of Positive Behavioral Interventions & Supports (PBIS) in all LCPS Schools. Continue to monitor the implementation of the framework in each school using formative and summative measures and fidelity checks that assess the quality of the implementation.”

D.5: “School Board and School Administrators should implemented graduated discipline practices giving consideration to the seriousness and chronicity of the violation to ensure that the consequences are matched with the seriousness of the offense and first considers a focus on positive discipline practices, such as rehabilitation, restitution, counseling, [and] debriefing, over the use of suspension and other exclusionary practices.

In determining an appropriate disciplinary consequence, relevant factors to be considered by administrators may include: the student’s age; previous disciplinary infractions; circumstances surrounding the misconduct; information about the students provided by parents, teachers, counselors, and other staff; other mitigating or aggravating factors.”

D.6: “Range of responses: Recommend that the School Board modify school policy and procedures to establish and include a varied range of responses to behaviors using methodologies (such as Restorative Practices, Collaborative Problem Solving, etc.) that produce evidence-based results.

The use of punitive exclusions should be reserved as a response to serious infractions that threaten the safety of the school environment, or for students who have not responded to other disciplinary methods.”

D.8 “Recommend that policy 5-55 Disciplinary Procedures for Students with Disabilities be modified to include a general statement that provides guidance to school administrators to consider unique circumstances of the incident and the student’s disability when the student violates the School Board policy or school code of conduct.”

In the six years that have followed, discipline disproportionality remains a perennial concern of both the SEAC and the MSAAC. LCPS’s own data [LCPS19] shows that modest progress was made immediately after the Task Force, but current trends are close to flat.

On February 15, 2015, the Loudoun Times-Mirror published an article, “The Isolation Room: Local parents share horror stories about school system’s treatment of students with special needs.” [Edmunds18] This set-in motion a series of media articles and public discussions on the subject of restraint and seclusion. LCPS staff have repeatedly stated that these are not disciplinary measures and only to be used in emergencies. SEAC has received many reports that this is not the case, and these dangerous and traumatizing techniques are in fact being used for disciplinary purposes. SEAC has received many reports that the use of these techniques is nearly always the product of a series of escalations in behavior due to prior LCPS disciplinary techniques. Peer-reviewed research and the experience of schools that have chosen reforms to eliminate restraint and seclusion have shown that the use of restraint and seclusion would be significantly reduced, if not eliminated, through the use of improved behavior supports that are effective in preventing escalation before situations become so severe that such techniques would be reasonably considered. However, the Loudoun County School Board chose to enact a policy that approved the status quo and did not require any reform.

During discussions of restraint and seclusion, as well as during discussions of behavior in general, both the School Board and the LCPS staff routinely refer to behavior concerns regarding students with disabilities. They refer to events where students emit behaviors such as hitting, kicking, biting, and throwing things, and express concern that these behaviors are making LCPS schools less safe. SEAC has received many reports of such behaviors, but reports we receive often also contain the additional context of extensive patterns of LCPS refusals to provide appropriate behavior supports and patterns of inappropriate behavior consequences that create a pattern of behavior escalations over time that lead to these most severe behavior concerns.

Peer-reviewed research and the experience of schools that have chosen to reform their behavior supports shows that positive, problem-solving behavior supports, offered and provided in a proactive and preventative manner, are far more effective than reactive punishments in preventing recurrence of behaviors and in preventing escalations to more severe behaviors. That evidence also shows that such approaches lead to significant increases in school safety, decreases in injuries, increases in morale, and increases in educational progress. Teachers are able to teach in a far safer and more educational environment instead of having to fear and anticipate having to drop everything and react to the next behavior incident.

When discussions of student behavior arise, the LCPS administrative staff present information about their efforts to implement Positive Behavior Interventions and Supports (PBIS) using a Multi-Tiered System of Supports (MTSS). They talk about a proactive and positive teaching approach, problem solving before and after incidents, Restorative Practices after incidents, and the importance of keeping students in the educational environment rather than being excluded. In discussions about student behavior, LCPS administrative staff and School Board Members haven't commented that certain problems are already solved because of these efforts.

SEAC has received numerous reports of significant disconnects between the LCPS administration's presentations and what is actually happening in LCPS schools, especially when students with disabilities are involved in behavioral incidents. SEAC has also received numerous reports of significant inconsistencies between LCPS schools. SEAC has received reports that some LCPS schools appear to be making genuine efforts to implement PBIS and are generally achieving the expected improvement outcomes. SEAC has also received reports of many LCPS schools where PBIS receives a cursory treatment and actual behavior responses remain old-fashioned and punitive, resulting in the same old-fashioned outcomes that have been the subject of School Board and SEAC concerns for many years.

SEAC has requested data from the LCPS administration that would help us better understand the state of PBIS implementation in various schools. As of the publication of this report, SEAC has not been provided with the necessary data.

### **c. Disclaimer: Not Legal Advice, Seek Competent Counsel**

Some of the concerns raised by the subcommittee are not only questions of educational policy and right and wrong, but also questions of compliance with federal and state laws and regulations based on our research and understanding. It is our understanding that SEAC can express concerns about compliance and refer to laws and regulations as a basis for those concerns.

We strongly recommend that the School Board discuss compliance concerns directly with competent counsel. It is our understanding that neither SEAC nor all non-attorney LCPS staff may provide legal advice.

Nothing in this document should be taken as legal advice. All law, including disability and Special Education law, is complex and often fact-specific, and questions can

only be definitively answered through a final decision. Different attorneys may reach different opinions.

The United States Department of Education's Office for Civil Rights provides assistance with understanding and complying with obligations under Section 504 of the Rehabilitation Act and the ADA. They can be reached at (202) 453-6020.

The Virginia Department of Education provides assistance with understanding and complying with obligations under the IDEA and Virginia's implementing regulations.

## **2. Community Concerns**

### **a. Students with disabilities are being suspended for causal behavior**

Students are being disciplined without reviewing the IEP for implementation of services and accommodations.

Students are being disciplined for their disabilities without implementing any additional supports or interventions, and implementation is reactive vs. proactive.

Policy should protect all students and staff by ensuring that students with disabilities receive safe and effective behavior supports that prevent future unexpected behaviors.

Students with disabilities are being punished disproportionately. A problem-solving approach should be used to identify issues and provide learning opportunities.

Sending students with disabilities home exacerbates the behavior. It does not address teaching the underlying skill deficits, and it is counterproductive.

There is a lack of consistency between schools in disciplining students. PBIS is not implemented consistently across LCPS schools.

### **b. Lack of parent collaboration and involvement**

No parent notification when behaviors begin to occur. Schools wait until behaviors have significantly escalated before notifying parents.

Reactive processes where the student with the disability is blamed for the behavior versus teaching and reviewing program supports.

Schools are making changes to the FBA and BIP without an IEP meeting or parent notification.

Lack of consistency between home and school with behavior, not enough collaboration and training with both parents and teachers.

Failure to collaborate with outside professionals such as BCBAs, psychologists, and other wrap-around supports.

### **c. Lack of teacher and administration training**



Administration has a fixed mindset instead of a growth mindset. Disabled students are treated if “that’s just the way they are,” and they are unable to grow, so the approach is to remove them and keep them away from the students that are succeeding instead of an approach of working to help the child improve.

Teachers are giving up on students and blame the students.

Insufficient teacher training. Students are then punished for their disability.

There is a lack of training on teaching students to communicate with AAC devices. This leads to students who are frustrated and emit behaviors.

There is an inappropriate teacher focus on punishing students instead of teaching. Some teachers use disparaging comments to manage students, which sets the student up for bullying and mental health issues.

There is a lack of specialists, such as BCBAs and clinical psychologists, to properly evaluate and service the underlying causes of behavior. LCPS is attempting to treat the surface symptoms instead of accurately identifying and addressing the problems.

#### **d. Insufficient Mental Health Supports**

Insufficient supports and understanding of the intersection of mental health, school refusal, suicide threats, and behavior.

#### **e. Lack of Social Emotional Learning**

Lack of social skills instruction for students with disabilities leads to behavior and being set up for bullying.

Lack of social skills instructions for all students and staff to better empathize, include, try to understand, and problem solve with disabled students. We need to help both the differently abled and nondisabled students learn how to better work together. Students, staff, and administration need to overcome this bias.

### 3. Findings

The Policy, Practices, and Procedures Subcommittee found that the proposed policy does not meet the needs of Special Education Students.

When reviewing this policy, the subcommittee noted with great concern that the current and draft policy represent a complete disconnect from what the LCPS administration and the School Board claims are current practices in LCPS schools. The draft policy is about suspending students and removing them from their educational placement. Initiatives and philosophies LCPS routinely talks about, such as PBIS, MTSS, keeping students in the educational environment, attendance, and the growth mindset, are all completely absent from the policy. Other recent LCPS policies affecting all students have been revised, sometimes very significantly and with significant controversy, to implement these initiatives. The subcommittee found it curious and concerning that LCPS staff did not choose to do the same for disabled students, while they chose to propose that the School Board remove the very weak protections that the current policy provides disabled students.

The subcommittee found that the draft policy proposes that LCPS move in the wrong direction with regards to improving behaviors for students with disabilities and solving these problems. This proposed action is counter to LCPS administration and School Board claims that they would like to improve behavior supports and outcomes and reduce disciplinary disproportionality.

The subcommittee found that most fundamentally, what is needed is for LCPS to implement significant, system-wide improvements to how student behavior is supported, how incidents are prevented, and how school staff prevent reoccurrence after incidents. The necessary improvements are both philosophical and methodological.

The subcommittee was concerned that many of the improvements that are needed to improve LCPS's behavior outcomes are things that the LCPS administration claims are already being done and have been for years. There is a significant disconnect between these claims and the reports that SEAC has been receiving of the realities of what happens in LCPS schools. The subcommittee found that the current policy – focusing on suspension and removal – is more representative of what actually happens in most LCPS schools when students with disabilities have significant behavioral concerns. The subcommittee found that the use of PBIS, MTSS, Restorative Practices, the emphasis on keeping students in the educational environment and attending school, and the philosophy of preventative, positive behavior supports and a growth mindset, needs to be mandatory, the primary focus, and the majority of the policy, relegating “old-fashioned” punitive measures to use only in the extremely limited situations where they are required by law.

The subcommittee found that the LCPS culture in general remains highly punitive towards students with disabilities who have behavior concerns. The current and draft policy reflect that. Revising the policy is a necessary but not sufficient step to improvement in this area. Most fundamentally, what is required is a change in culture, and this is perhaps the most difficult kind of change for the School Board and LCPS administration to effect. Change in outcomes is going to require change in thinking and actions. The benefits – to everyone – of such changes would be well worth the effort.

The Merriam-Webster definition of “discipline” as a verb is:

1. to punish or penalize for the sake of enforcing obedience and perfecting moral character
2. to train or develop by instruction and exercise especially in self-control
  - a. to bring (a group) under control
  - b. to impose order upon

If the definition of discipline is integrated back into the title of this policy, the result is, “Procedures for Punishing or Penalizing Students With Disabilities for the Sake of Enforcing Obedience and Perfecting Moral Character.” The subcommittee found that the definition of the word “discipline” – the root of the first word of the title of this policy -- is incompatible with the philosophies that LCPS has adopted and carries connotations that are concerning. The word “discipline” carries with it much of the old-fashioned philosophy and approach to behavior that LCPS is trying to evolve away from.

“All of the research in the neurosciences for the past fifty years has shown beyond a shadow of a doubt that challenging kids do not lack the will to behave well, they lack the skills to behave well. [...] In other words, what all the research in the neurosciences has shown us is that kids who exhibit chronic, challenging behavior – You know what? They have like a learning disability. Except instead of areas like reading, math, and writing, this learning disability is in areas like problem-solving, flexibility, frustration tolerance. I think it’s an accurate, apt, and powerful analogy. And here’s why. I’m in my mid-forties. If we went back to when I was in elementary school, actually not far from here, if there was a child who was reading several grade levels behind his peers, back then, well-meaning, empathic[sic], caring educators would not have said to themselves, ‘I wonder if he has a learning disability. I wonder if he has dyslexia. I wonder if he has a hard time phonetically decoding words.’ No, actually, forty years ago, those folks would have said, ‘I wonder if he is either dumb[sic] or lazy.’ And I know that there are people sitting here, listening right now, who can attest to the personal pain of that, to being the child in the classroom who, ironically, was trying harder than anybody else in that classroom to read, and was completely misunderstood.” [Ablon14]

*“If a child doesn’t know how to read, we teach.*

*If a child doesn't know how to swim, we teach.*

*If a child doesn't know how to multiply, we teach.*

*If a child doesn't know how to drive, we teach.*

*If a child doesn't know how to behave, we... teach? ...punish?*

*Why can't we finish the last sentence as automatically as we do the others?"*

Tom Herner, former President, National Association of State Directors of Special Education (NASDE)

"What if we intentionally taught children how to behave? What if we taught them how to share, rather than saying, 'You need to share.' What if we taught them how to make friends, how to initiate play, how to take turns, and then, what if we gave them many opportunities to practice? Imagine a world where we intentionally taught children social skills, gave them many opportunities to practice, and positively reinforced them every time they used those skills." [Allen16]

The subcommittee found specific concerns with the practice of out-of-school suspensions. Peer-reviewed research shows that suspensions often increase the probability of future recurrence of unexpected behaviors rather than preventing recurrence, that is, the outcomes of suspensions are nearly the opposite of their purpose. Suspensions often provide unintended reinforcements to the student that are processed by the child as a reward (for example, teaching a child that hitting a teacher gives him a day off from school) and often teach unintended lessons counter to teacher's verbal lessons (for example, teaching a child that they don't always have to go to school, and that they don't belong at school).

Suspensions are strongly linked to the "school-to-prison" pipeline and poor long-term outcomes for students. Disproportional suspensions for students with disabilities leads to disproportional loss of disabled students to bad life outcomes that could be avoided if only LCPS would instead choose to employ effective interventions. SEAC has received reports of LCPS students with behavior problems ending up as adults in group homes and the prison system. Many of them could have been productive members of society had LCPS given them the help they needed when they were children.

The subcommittee also found concerns with "stealth suspensions." SEAC has received reports of disciplinary practices in LCPS schools that are similar to suspensions in their exclusion and effect on the child, but do not meet the LCPS definition of a suspension. The subcommittee hypothesized that these are being used as a result of the LCPS initiative to measure and reduce suspensions, and are an example of the tragedy of "you get what you measure." Because schools

are under pressure to reduce their suspension numbers, the subcommittee is concerned that they are reducing those numbers by slightly changing what they are doing in order to avoid accountability, rather than undertaking the transformative changes to behavior responses that were intended. SEAC has received reports of similar responses to LCPS measurement and accountability for seclusion, where schools are slightly changing their tactics to avoid a technical definition rather than truly improving. As a result, the subcommittee found that policies intended to drive improvement should be written in terms of broadly written prohibitions for deprecated methodologies to discourage attempts to evade improvement and accountability mandates.

Finally, the subcommittee found that students with disabilities require more, not fewer, protections from inappropriate behavior responses, and that removing protections for students with disabilities would be a change for the worse.

## 4. Recommendations

Recommendation 1: Rewrite the title and policy to remove the word discipline and use the language and concepts of PBIS.

Title Suggestion: Behavioral Interventions and Supports for Students with Disabilities.

**Disposition: Approved unanimously.**

Rationale:

In order to achieve meaningful improvement, we need to change the way we all think and act about behavior.

LCPS has adopted Positive Behavior Interventions and Supports (PBIS) and “growth mindset” approaches.

LCPS policies and procedures should implement those PBIS and “growth mindset” approaches.

The word “discipline” should be retired from our vocabulary and thinking.

Recommendation 2: Rewrite the policy to emphasize constructive interventions over tactics or disciplinary sanctions that remove students from instruction

**Disposition: Approved unanimously.**

Rationale:

LCPS has accepted, adopted, and documents the use of PBIS in all schools

The policy should implement and support PBIS, attendance, and growth mindset initiatives, not work against them.

LCPS is incorporating these philosophies into all other policy areas, this should also include student behavior (formerly discipline).

(Note: The recommendation wording originally proposed by the subcommittee was "The Policy should be written to emphasize constructive interventions over tactics or disciplinary sanctions that remove students from instruction." Should was replaced by shall as a friendly amendment during the meeting. The wording above is an editorial revision for clarity and does not change the intent of the committee.)

Recommendation 3: Suspension, and exclusionary disciplinary practices tantamount to suspension, shall not be permitted except where required by law.

**Disposition: Approved unanimously.**

Rationale:

Correct implementation of PBIS eliminates the need for suspension.

Evidence shows that suspensions:

Increase, not decrease, unexpected behavior.

Make schools less safe.

Have many unintended consequences.

Are a critical step in the school-to-prison pipeline.

SEAC has received many reports of restraint, seclusion, and suspension being replaced by practices that are only slightly different and continue to cause harm. All practices that exclude students from education should be closely examined and replaced by practices that use education as a positive solution.

Many public-school systems and private schools have abolished suspension.



Recommendation 4: Rewrite the policy to cite the Virginia Regulations Governing Special Education Programs, 8VAC20-81-160 (Discipline Procedures) instead of incorrectly restating those procedures.

**Disposition: Approved unanimously.**

Rationale:

The current draft spends most of its current body restating the regulations inaccurately. Every error identified is unfavorable to the student.

The state regulations preempt LCPS policy.

Recommendation 5: Change “School personnel may consider any unique circumstances” back to the existing policy wording “School personnel shall consider any unique circumstance”

Change “school personnel should review the student's [IEP/504/BIP]” to “school personnel shall review the student's [IEP/504/BIP]”

(Emphasis ours)

**Disposition: Approved unanimously.**

Rationale:

For the former, the draft revised policy significantly weakens the requirement to consider the student's disability.

For the latter, suspension and removal from the educational environment are actions with significant adverse impact on a student's educational progress.

School personnel are required to consider each individual student's unique circumstances to ensure provision of a Free Appropriate Public Education (FAPE).

## 5. References and Documents Considered

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